UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 11 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL 7009 1680 0000 7677 7766
RETURN RECEIPT REQUESTED

Mr. James Osborne
Senior Manufacturing Engineering Manager
TI Automotive
184 Gratiot Boulevard
Marysville, Michigan 48040

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No.: MID985664143

Dear Mr. Osborne:

On May 25, 2016, representatives of the U.S. Environmental Protection Agency and Michigan Department of Environmental Quality inspected the TI Automotive ("TI") facility located in Marysville, Michigan. As a large quantity generator of hazardous waste, TI is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate TI's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by TI, on EPA's review of records pertaining to TI, and on the inspector's observations, EPA has determined that TI has unlawfully stored hazardous waste without a license or interim status as a result of TI's failure to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which TI was out of compliance at the time of the inspection in paragraphs 1 and 2, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste ("TSDF requirements"). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSDF requirement. The exemption condition identified in paragraph 2 is also an independent TSDF requirement incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, TI's failure to comply with this condition is also a violation of the corresponding requirement in in Mich. Admin. Code. r. 299.9601(1)-(3) and

299.11003(1)(p) and (q) [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Mich. Admin. Code. r. 299.9601(1) and (2) and 299.11003(1)(m) – (o) [40 C.F.R. Part 264] (if the facility should have been licensed).

Finally, EPA has determined that TI violated RCRA requirements related to hazardous waste determinations, used oil and universal waste, as described in paragraphs 3 - 5, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSDF REQUIREMENTS

At the time of the inspection, TI was out of compliance with the following large quantity generator license exemption condition:

1. Satellite Accumulation Area

   Under Mich. Admin. Code r. 299.9306(2) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste.

   At the time of the inspection, hazardous wastes generated in the laboratory were being taken to a 55-gallon drum of waste hydrochloric acid outside of the laboratory. The drum of waste acid was a satellite for another process, was not at or near the point of generation in the laboratory, and was not under the control of the generators of the waste.

The license exemption condition identified below in paragraph 2 is also an independent TSDF requirement violated by TI:

2. Contingency Plan and Emergency Procedures

   Under Mich. Admin. Code r. 299.9306(1)(d), 40 C.F.R. part 265, subpart D [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)], the facility contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

   At the time of the inspection, the list of emergency coordinators in the contingency plan was up to date, however, phone numbers and addresses were not included in the list, and the primary and alternate emergency coordinators had not been differentiated.

Summary of license exemption conditions: By failing to comply with the conditions for a license exemption above, TI became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. TI failed to apply for such a license. TI's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510

[40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) is also an independent violation of the corresponding TSDF requirement.

WASTE DETERMINATION, USED OIL, AND UNIVERSAL WASTE VIOLATIONS

TI violated the following generator requirements:

3. Hazardous Waste Determinations

Under Mich. Admin. Code. r. 299.9302(1) [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. A generator must keep records of any test results, waste analyses, or other determinations made in accordance with §262.11 for at least three years from the date that the waste was last sent for treatment, storage, or disposal. See, Mich. Admin. Code. r. 299.9307(1) [40 C.F.R. § 262.40(c)].

At the time of the inspection, TI was storing one 55-gallon drum of waste in the raw chemical storage room near the loading docks on the northeast side of the facility. The label on the container listed, among other things, rags contaminated with paint. Paint wastes at the facility have been determined to carry F003 and F005 listings, however, the container was marked as "Non-Hazardous Waste." Documentation was not presented to support a non-hazardous waste determination.

Also at the time of the inspection, the hydrochloric acid waste stream generated from the coating line for metal tubing was determined to be hazardous and was characterized with the D002, D004, and D007 waste numbers. The documentation for this waste determination did not provide information to support the presence of arsenic (D004) or chromium (D007) even taking into account the comingling of waste Clark Solution from the laboratory into this waste stream.

4. Used Oil Requirement

Under Mich. Admin. Code. r. 299.9810(3) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, a spill pallet beneath containers of used oil was itself half-filled with used oil. The pallet was not labeled with the words, "Used Oil."

Note: The pallet was pumped out into a 55-gallon drum during the inspection. No further action is requested for this violation unless TI continues to place used oil into the pallet.

5. Universal Waste Requirement

Under Mich. Admin. Code. r. 299.9228(4)(c)(ii) [40 C.F.R. § 273.13(d)(1)] a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

At the time of the inspection, TI was storing used 8-foot lamps in a fiberboard cylinder. This container was not closed.

At this time, EPA is not requiring TI to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at whitney.brenda@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Susan McDonald, MDEQ (mcdonalds3@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)
Steve Sliver, MDEQ (slivers@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	May 25, 2016
Facility Name:	TI Automotive
Facility Address:	184 Gratiot Boulevard Marysville, Michigan 48040
EPA RCRA ID Number:	MID985664143
Generator Status:	Large Quantity Generator
Facility Contact:	James Osborne – Senior Manufacturing Engineering Manager
U.S. EPA RCRA Inspector:	Brenda Whitney - Environmental Engineer Land and Chemicals Division Resource Conservation and Recovery Act (RCRA) Branch Compliance Section 2

Prepared By: Brenda Whitney – Environmental Engineer — Date: 6-20-16

Approved By: Julie Morris – Chief, Compliance Section 2 — Date: 6/22/16

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "Inspection") of the TI Automotive ("TI") located in Marysville, Michigan on May 25, 2016. This CEI was an evaluation of TI's compliance with the RCRA hazardous waste regulations codified in the Michigan Administrative Code and the Code of Federal Regulations. The Facility has notified as a large quantity generator of hazardous waste generating more than 1,000 kilograms of hazardous waste per month. Susan McDonald of the Michigan Department of Environmental Quality participated in this CEI.

Participants

Mark Eschenburg – Engineering Manager	TI
James Osborne – Sr. Manufacturing Engineering Manager	TI
Shawn Koza – Plant Manager	TI
Susan McDonald – Hazardous Waste Quality Analyst	MDEQ
Brenda Whitney – Environmental Engineer	U.S. EPA

Introduction

Upon arrival at TI at 8:15 a.m., EST, I signed in at the front desk and presented my credentials. The front desk attendant contacted Mr. Koza who provided a conference room for an introductory meeting. Mr. Osborne and Mr. Eschenburg also joined us shortly thereafter in the conference room. I delineated the purpose and logistics of the CEI to the TI representatives, and we discussed TI's manufacturing operations focusing on waste generation sources and management methods. I informed the representatives that I would be taking photographs during the CEI as needed. I provided the following compliance assistance documents; *Michigan Retired Engineers Technical Assistance Program* (*RETAP*) sheet *(MDEQ brochure)*; *P2 Technical Assistance Contacts; and U.S. EPA Small Business Resources*. We discussed the procedures EPA uses for controlling confidential business information. I was then escorted on a walking tour of the facility before returning to office to review records. Upon completion of the CEI, I held a closing conference with TI representatives.

Site Description

The following information about TI is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

TI is headquartered in Auburn Hills, Michigan, and is one of over 100 facilities in 27 countries. TI Automotive facilities manufacture either fuel tank delivery systems (FTDS) or fluid carrying systems (FCS). This facility manufactures metal and plastic brake fluid and fuel tubes under the FCS division. This building is 220,000ft^2 in size, of which approximately 160,000ft^2 is manufacturing. TI has been leasing the facility space since 1992. At the time of the CEI, 138 people were employed at this facility and worked in three shifts, mostly five days a week.

For metal tubing, the process begins with three low-carbon steel base products: single-wall tube (fuel lines only); copper-plated ribbon; and zinc-treated tube. The copper-plated ribbon requires the most manufacturing steps and will be discussed first.

The ribbon is first rolled into a double-walled tube. The copper plate of the ribbon is braised through a series of induction coils ensuring uniform cohesion of the tube walls into what acts as

The coating process includes the following steps:

- Potassium hydroxide (KOH) cleaning stage to remove oil and rust preventatives (single wall-products only);
- Muriatic acid (HCl) etch of the copper surface of the tube;
- Flow coat of a zinc-aluminum coating. Flow coating means the tubing is run through a unit where the coating is sprayed onto the line. Unlike a dip process, the tube is continuously in motion through these units and the overspray is collected in a recirculation tank;
- Quench water flow unit;
- The zinc-aluminum coating is flow coated with a slightly acidic etching solution (trade name - Bonderite);
- Primer (phenolic resin) is flow coated onto the line;
- Solvents from the primer are flashed off in a gas oven (facility does have an air permit);
- The primer is cured and cross-linked through induction;
- Nylon is extruded onto the line.

Approximately 5-10% of the lines that have been zinc and nylon coated are also processed through a propylene coating line which adds additional abrasion and pitting resistance for vehicles that are susceptible to abrasive environments.

Incoming single-wall tubing skips the rolling and braising steps in the beginning, but is processed through the same coating process as the ribbon (with the addition of the first step listed above, which is cleaning with KOH). In addition to skipping rolling and braising, incoming zinc-treated tube also skips the first four steps of the coating process, the purpose of which are to apply a zinc-based coating.

Flexible plastic tubing (flex tube) is used for fuel lines only. TI can manufacture mono-wall tubes using a single resin extrusion, up to a 6-layer product using different polymer layer configurations. Creating the tube involves heating and extruding polymer beads into a single-layer or laminated tube. Hazardous waste is not generated from making these tubes, but a small amount of ink waste is generated from printing identification codes on the finished tube.

Other areas of the facility include uncoiling and cutting the tube (do not use any cutting oils), maintenance and tooling support, a neutralizing waste water treatment system for quench and rinse waters, and a laboratory.

Wastes are generated in the following areas:

- Used oil from tube rolling and braising – oil is used to lubricate the tubing and is collected in catch basins under the forming mill and braising boxes;
- Spent KOH – recirculation tank is batch cleaned out on a monthly schedule. This waste is used for pH adjustment in the WWTS and is not managed as a hazardous waste;
- Spent HCl – recirculation tank is batch cleaned out on a weekly schedule;
- Zinc-aluminum melt pot – dross removed and sent for recycling;
- Spent Bonderite – managed as non-hazardous waste;
- Spent paint-related solids/liquids ("paint" is phenolic resin-based primer) – managed as hazardous wastes and accumulate in satellite containers by the line. One solvent is used

to thin the paint and to clean it;

- Nylon-coating extrusion wastes – plastic blobs are collected for recycling;
- Scrap tubing (metal and plastic) – sent for recycling;
- Ink jet printer waste – combined with spent paint-related liquids at the line or in a separate satellite in maintenance;
- Maintenance wastes – include waste ink from fixing printers and aerosol can wastes generated from puncturing cans;
- Laboratory wastes – chemicals from testing combined with wastes outside of lab;
- Phosphoric acid - used in heat exhangers and chillers to remove scale;
- Fork lift/gear box/compressor/air filtration used oil – combined with braising oil;
- Universal wastes; and
- WWTS filter cake – managed as non-hazardous waste.

Site Tour

The tour began at the receiving docks on the east side of the facility where raw materials such as resin, zinc-aluminum ingots, steel ribbon (strip), single-wall tube, and zinc-coated tubes are brought into the facility. Near the dock was a raw chemical storage room. I observed a 55-gallon drum marked as "Non-Hazardous Waste" (See Appendix A: Photograph 1). The label stated that the drum held rags contaminated with paint. Paint wastes at the facility have been determined to carry F003 and F005 listings.

The hazardous waste storage area ("Haz-Pad") was located south of the chemical storage room (See Appendix A: Photograph 4). The Haz-Pad was constructed with epoxy coated concrete that is sloped to a blind sump and is curbed and fenced. Categories of wastes are posted on the wall in demarked rows. The headings were: phosphoric acid; HCl; soda-ash/absorbent (non-haz); Bonderite (non-haz); paint-related material; paint rags; and used oil. Used KOH was not designated for storage in this area. Mr. Eschenburg stated that this waste is used as is for pH adjustment in the WWTS. No containers of hazardous waste were in the area at the time of the inspection. One drum of "Oil-Based Paint Cans" was in the corner of this area (See Appendix A: Photograph 3). According to Mr. Osborne, RCRA-empty paint cans are placed in this drum.

The Haz-Pad was equipped with spill kits, fire extinguishers, a phone, and an overhead sprinkler system in addition to the secondary containment provisions.

The universal waste storage area was in front of the Haz-Pad in an area also protected by a fence. Used 4-foot and 8-foot lamps were stored in two cardboard cylinders that were labeled as "Universal Waste – Lamps." The cylinder for the 8-foot lamps was open. An empty gaylord was set up for "Universal Waste – Electronics." Two empty 5-gallon buckets were in place for "Universal Waste Batteries" (See Appendix A: Photograph 2).

As we made our way toward the north docks/warehouse, I observed two 5-gallon buckets positioned under spigots on a piece of equipment. These buckets were empty, but Mr. Eschenburg explained that the equipment was an air filtration unit for the fumes coming off of the braising process. The oil removed from the filtration unit is collected in the buckets and transferred to a drum on a nearby pallet (See Appendix A: Photographs 5 and 6). I observed the

drum which was labeled as "Used Oil." One 5-gallon bucket on the pallet also contained some oil and was labeled as "Used Oil." The pallet upon which these containers were placed was more than half-filled with oil. Mr. Eschenburg had an employee hand pump the oil out of the pallet into the drum.

In the north docks warehouse area, I observed the incoming tubes and strips along with other raw materials in storage. The warehouse had a mezzanine office area that was used for storage and a tooling area for maintenance of manufacturing equipment. No waste was observed in these areas.

The inspection doubled back to the head of the double-walled tube manufacturing process line. Walking the line, I observed the decoilers, ribbon accumulator (which reduces waste when changing reels of incoming ribbon), rolling station (forming the double-walled tube), the series of induction coil boxes, water quench troughs (from which the hot water is fed through non-contact chillers before reuse), and the coiling apparatus.

I next observed the flex tube extrusion line. Hydroscopic beads of polymer draw moisture and must be dried in a desiccant process prior to being fed into the manifold system and extruded into tubes. The cooled tubes are printed with ink, heated up one more time to relieve stress, and then coiled up.

The coating line for metal tubing was next. We walked behind the line to get to the head of it. I observed the fume scrubber for HCl. I also observed a 55-gallon drum for spent KOH, which was to be used for pH adjustment in the WWTS. This container was labeled as "Spent Alkaline." At the head of the line, I observed the decoilers, tube accumulator, KOH flow coat tank, KOH rinse tank, HCl flow coat tank, HCl rinse tank, induction heaters for the zinc-aluminum ingots, quench tanks, Bonderite tank, paint process equipment, nylon extruder, quench tank and ink printer.

A 55-gallon drum of spent HCl was located next to the HCl flow coat tank. The drum was closed and marked as "Hazardous Waste" with the D002, D004, and D007 waste numbers. A 55-gallon drum next to the Bonderite station was marked with the Michigan liquid industrial waste number 029L. Two 55-gallon drums, one for liquids and one for solids, were located next to the paint process equipment. The drum of solids was closed, labeled as "Hazardous Waste," and marked with the D035, F003 and F005 waste numbers. The liquids drum was closed, labeled as "Hazardous Waste," and marked with the D001, D035, F003, and F005 waste numbers. Ink waste from the printing station was located near the printer. The drum was marked as "Hazardous waste" and "Paint-related material" and the D001, D035, F003, and F005 hazardous waste numbers. The spent ink from the printer on the flex tube line is also discarded in this container.

The laboratory was next on the tour. The first section of the lab was for dry measurements including tensile strength and hardness. The second section was a wet lab. Solutions are used to remove the nylon or zinc coatings. Wastewater generated in this lab is processed through the WWTS. Spent benzoyl alcohol is managed as non-hazardous waste and is collected in a 55-gallon drum inside the lab. Spent "Clark Solution" is taken to the spent HCl drum on the coating line.

The tour continued to "Spin Weld." Hazardous waste was not observed in this area.

The maintenance area in the southwest corner of the facility was next on the tour. A 55-gallon drum for spent ink was located in a station for fixing printers. The drum was closed, labeled as "Hazardous Waste," and marked with the D001, D035, F003 and F005 waste numbers. One other container in the area was fitted with an aerosol can-puncturing mechanism. This 55-gallon drum was closed, labeled as "Hazardous Waste" and marked with the D001, D035, F003 and F005 waste numbers. The emptied cans are discarded as RCRA-empty non-hazardous waste.

The last areas inspected were "Cutting," the polypropylene coating line, and the southeast shipping docks. Blobs of scrap polypropylene are collected for recycling from the polypropylene line. Hazardous waste was not observed in any of these areas.

End of Tour

Records and Emergency Preparedness Review

Preparedness and Prevention: The Facility is equipped with internal communications and alarm systems. Phones are available for external communications to summon emergency assistance. In addition to a plant-wide fire suppression system, portable fire extinguishers and spill control equipment are located throughout the Facility and near the 90-day hazardous waste storage area. Emergency equipment is tested and maintained according to a schedule. Arrangements with local emergency response authorities have been made.

Contingency Plan:

- The list of emergency coordinators did not include requisite information.
- The plan includes emergency evacuation information and emergency equipment lists complete with descriptions, capabilities, and locations.
- A list of contact information for local emergency responders includes a description of arrangements made with those responders.
- The plan has been submitted to emergency responders.

Training: Hazardous waste management training is provided to employees who sign manifests, act as emergency coordinators and conduct weekly inspections. This training is provided through an outside contractor. The training was last provided on 9-11-15 and 3-14-14. Plant-wide training is also provided for general safety and environmental awareness annually through the same contractor.

Manifests: Three years of hazardous waste manifests were available for review. Land disposal restriction (LDR) forms were also available for review.

Inspections: Inspections were consistently conducted weekly by James Osborne. Three years of records were available for review.

Waste Determinations: Waste profiles were available for review. One profile for the HCl waste did not explain where the D004 and D007 waste codes were coming from. Mr. Eschenburg stated that the Clark Solution from the laboratory may contribute to these

waste numbers, but was not certain.

Closing Conference

The following items were discussed with TI personnel at the close of the inspection:

- Confidential Business Information (CBI) – It was determined that I did not collect information or photographs that were to be managed as CBI.
- Waste profile clarifications;
- Management status for container of hazardous waste in the drum receiving dock room;
- Universal waste requirements;
- Use oil requirements;
- Satellite accumulation requirements; and
- Emergency coordinator designations in contingency plan.

List of Appendices

- Appendix A: Photograph Log
- Appendix B: Checklists

Appendix A

Photograph Log

Inspection Date:
May 25, 2016

Facility Name and ID Number:
TI Automotive
EPA ID: MID985664143

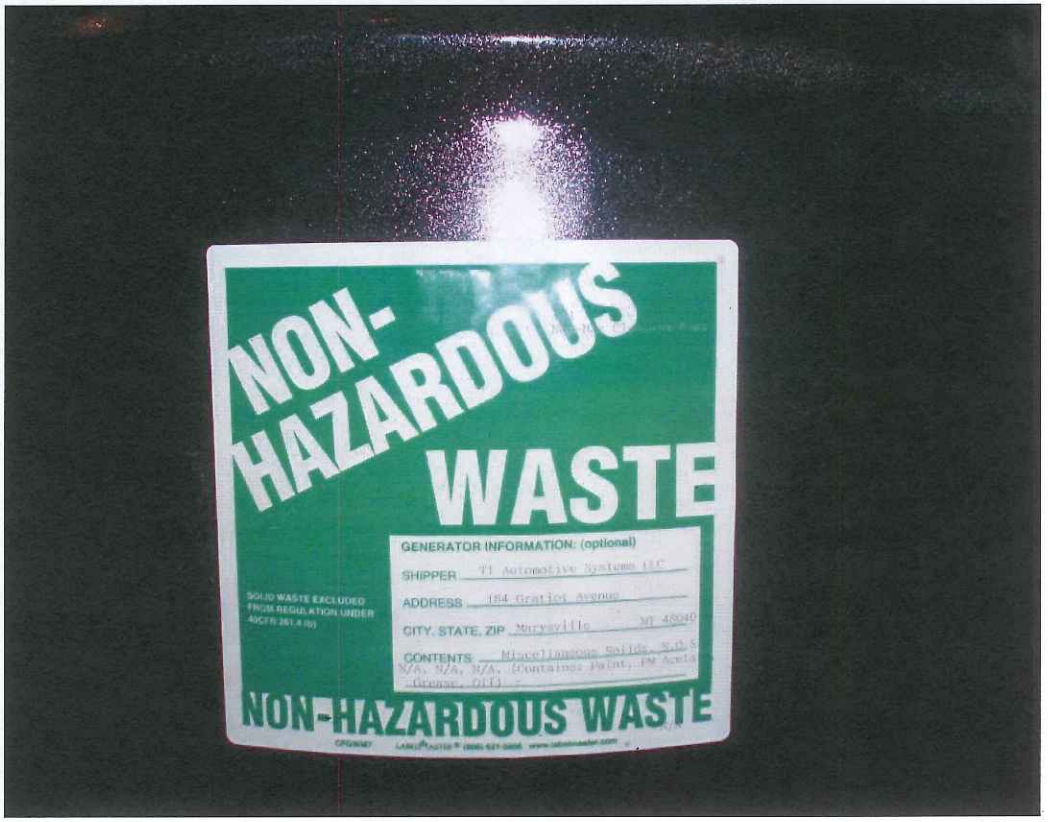
Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Camera Used:
Olympus Stylus 600
Serial Number: A47525904

Photograph 1

Taken at 9:29 a.m. EST

In the raw chemical storage room, I observed a 55-gallon drum marked as "Non-Hazardous Waste". The label stated that the drum held rags contaminated with paint. Paint wastes at the facility have been determined to carry F003 and F005 listings.



Photograph 2

Taken at 9:40 a.m.

The universal waste storage area was in front of the Haz-Pad in an area also protected by a fence. Used 4-foot and 8-foot lamps were stored in two cardboard cylinders that were labeled as "Universal Waste – Lamps." The cylinder for the 8-foot lamps was open. An empty gaylord was set up for "Universal Waste – Electronics." Two empty 5-gallon buckets were in place for "Universal Waste Batteries."

Photograph 3

Taken at 9:40 a.m. EST

One drum of "Oil-Based Paint Cans" was in the corner of the Haz-Pad. According to Mr. Osborne, RCRA-empty paint cans are placed in this drum.

Photograph 4

Taken at 9:41 a.m. EST

The Haz-Pad was located south of the chemical storage room. The area was constructed with epoxy coated concrete that is sloped to a blind sump and is curbed and fenced. No waste was stored in the area at the time of the CEI.

Photograph 5

Taken at 9:45 a.m. EST

Used oil is collected in a drum on a pallet near the Haz-Pad area. I observed the drum which was labeled as "Used Oil." One 5-gallon bucket on the pallet also contained some oil and was labeled as "Used Oil." The pallet upon which these containers were placed was more than half-filled with oil.

Photograph 6

Taken at 9:45 a.m. EST

See description under Photograph 5.

Appendix B

Checklists

Inspection Date:
May 25, 2016

Facility Name and ID Number:
TI Automotive
EPA ID: MID985664143

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name TI Automotive - Marysville, MI Part 3 Rules

Date _____ ID# _____ 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE To be used in	HOW MUCH
KOH rinse bath	cleaning (WWTS-pH adjustment)	> 1000 kg/mo
HCl bath	cleaning	
paint solids	paint/primer lines	
paint liquids	paint/primer lines	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11

(NI = Not inspected; N/A = Not applicable)

		YES	NO	
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	X		NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	X		NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	X		NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C			NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	X		NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	X		NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	X		NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:				
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	X		NI N/A
7. **NOT APPLICABLE**				
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3rd signature manifest as requested by Director? (Rule 304(2)(c))	262B			NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	X		NI N/A

***NOTE:** For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).*

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B		X	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).				
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:			0	
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:				
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	X		NI N/A
-OR-				
13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B			NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
a) all listed waste	**268A**	[X]	___ NI N/A
b) all characteristic wastes?	**268A**	[X]	___ NI N/A

***NOTE**: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	**268A**	[X] ___ NI N/A
OR		
16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	**268A**	[ ] ___ NI N/A
OR		
17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	**268A**	[ ] ___ NI N/A
OR		
18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	**268A**	[ ] ___ NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)		
a) EPA hazardous waste #?	**268A**	[X] ___ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	**268A**	[ ] ___ NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	**268A**	[ ] ___ NI N/A
d) manifest number associated with the shipment?	**268A**	[ ] ___ NI N/A
e) waste analysis data, where available?	**268A**	[ ] ___ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	**268A**	[X] ___ NI N/A
UNLESS		
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	**268A**	[ ] ___ NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	**268A**	[X] ___ NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)		
a) if the notice is for shipments that meet the standards does the notice include the certification?	**268A**	[ ] ___ NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	**268A**	[ ] ___ NI N/A

***NOTE**: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
***NOTE**: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

HC1 - D004, D007 (Why)

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	**268A**	[X] ___ NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	**268A**	[ ] ___ NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	**268A**	[X] ___ NI N/A

***NOTE**: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	**268A**	___ [X] NI N/A

TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	**268A**	[ ] ___ NI N/A

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	**262D**	[X] ___ NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	**262D**	[X] ___ NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

		YES NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said__obsrvd__ [X] ___ NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said__obsrvd__ [X] ___ NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said__obsrvd__ [X] ___ NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X] ___ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35) NONE@Time Of CEI		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	[ ] ___ NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	[ ] ___ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	[ ] ___ NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C	___ [ ] NI N/A

OR

e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	[ ] ___ NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	[ ] ___ NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	[ ] ___ NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	[ ] ___ NI N/A
g) are containers compatible with waste in them (265.172)	262C	[ ] ___ NI N/A
h) are containers stored closed? (265.173(a)) NO WASTE	262C	[ ] ___ NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	___ [ ] NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	[X] ___ NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[X] ___ NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	[X] ___ NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [X] NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[X] ___ NI N/A

According to facility

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[ ] X NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[X] ___ NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[X] ___ NI N/A
e) are container(s) in good condition? (265.171)	262C	[X] ___ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[X] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[X] ___ NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	[ ] ___ NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[ ] ___ NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
a) impervious base free of cracks? (264.175(b)(1)) :	262C	[X] ___ NI N/A

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	[X]	NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	[X]	NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	[X]	NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	[X]	NI N/A

NOTE: *Closure of Accumulation Area covered under # 53.*

36. If accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	[X]	NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? *Explain any yes answer.*		X	NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	[X]	NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	[X]	NI N/A
40. Is hazardous waste accumulated in tanks? *If so, complete Tank System inspection form.*		X	NI N/A
41. Is hazardous waste placed on drip pads? *If so, complete Wood Preserving inspection form*		X	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16

PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	262C	[X]	NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))	262C	[ ]	NI N/A
b) job descriptions? (265.16(d)(2))	262C	[ ]	NI N/A
c) name of employee filling each job? (265.16(d)(1))	262C	[ ]	NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	[ ]	NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)	262C	[ ]	NI N/A
f) records of training? (265.16(d)(4))	262C	[ ]	NI N/A
g) do new personnel receive required training within 6 months? (265.16(b)	262C	[ ]	NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	[ ]	NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	[X]	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.

PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	co said obsrvd [X]	NI N/A
45. If required, does this facility have the following:			
a) internal communications or alarm systems? (265.32(a))	262C	[X]	NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	[X]	NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	[X]	NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	[X]	NI N/A
46. Testing and Maintenance of Emergency Equipment			
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	[X]	NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable **only** if required (40 CFR 265. 32)			
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	[ ]	NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	[ ]	NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35) no waste	262C	[X]	NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	[X]	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	[ ]	NI (N/A)
49. Does the contingency plan contain the following:			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	[X]	NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	[X]	NI N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	[ ] X	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[X]	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	[X]	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	[X]	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	[X]	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	[X]	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[ ]	NI N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	[ ]	NI N/A
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	[ ] X	NI N/A BW
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	[X]	NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		X	NI N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	[ ]	NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	[ ]	NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	[ ]	NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ]	NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ]	NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ]	NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[ ]	NI N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	[ ]	NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	[ ]	NI N/A

COMMENTS:

DEQ

Department of Environmental Quality, Waste and Hazardous Materials Division

USED OIL INSPECTION FORM – GENERATORS

Facility's Name TI Automotive Part 8 Rules

Date 5/25/16 ID# MID985664143 1994 PA 451

Note: *Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109*

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

		YES	NO
1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		X	
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA		X
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA		X
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	X	
d) mixture of used oil and fuel? (Rule809(1)(d))	UOA		X
e) material which is produced from used oil & is burned for energy recovery? (Rule 80991)(e))	UOA		X
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1(f))			
i) maximum arsenic concentration of 5ppm	UOA		
ii) maximum cadmium concentration of 2ppm	UOA		
iii) maximum chromium concentration of 10ppm	UOA		
iv) maximum lead concentration of 100ppm	UOA		
v) minimum flash point of 100 degrees Fahrenheit	UOA		
vi) maximum total halogen concentration of 4,000ppm	UOA		
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA		X
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA		X
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA		X
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule809(2)(b)(ii))	UOA		
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed?(Rule 809 (2)(c))	UOA		
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA		
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809((2)(g))	UOA		
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809 (2)(j))	UOA		
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m)	UOA		
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule809(2)(o))	UOA		
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		

GENERATOR REQUIREMENTS (Rule 810)

NOTE: Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO	
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4))	UOA		X	NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	X		NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	X		NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	X		NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA			NI N/A
6. Upon detection of a release does the facility:				
a) stop the release? (40 CFR 279.22(d)(1)) (NOT SURE SOURCE OF LEAK INTO SPILL PALLET)	UOA	X		NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	X		NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA		X	NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA			NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER

(Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):				
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA			NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour?(40 CFR 279.23(b))	UOA			NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA			NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL

(Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	X		NI N/A

OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?				
a) self transportation of small amounts to approved collection centers provided that the generator transports:				
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA			NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA			NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA			NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))				
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA			NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA			NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA			NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA			NI N/A
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA			NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA			NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA			NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA			NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA		X	NI N/A

COMMENTS:-

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION

Facility Name TL Automotive Part 2 Rules

Date 5/25/16 I.D. # MI0985664163 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

		YES	NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B		X NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B		X NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4) NONE QTY HANDLED: ____

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C)). **[USE TANK CHECKLIST]**	273.B	[ ] NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(iii))	273.B	[ ] NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements) QTY HANDLED: ____

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	X [ ] NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[ ] NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[ ] NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	X [ ] NI N/A

CONSUMER ELECTRONICS: (Rule 228(4) NONE QTY HANDLED: ____

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d) QTY HANDLED: ____

17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	X NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii))	273.B	[ ] X NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	X NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[ ] NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[ ] NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[ ] NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[ ] NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14 NONE QTY HANDLED: ____

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) QTY HANDLED: ____ NONE

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] NI N/A

PHARMACEUTICALS: (Rule 228(4) QTY HANDLED: ____ NONE

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.B	[ ] ___ NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	[ ] ___ NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (If no go to question 38)	273.B	[X] ___ NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	[ ] ___ NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	[X] ___ NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	[ ] ___ NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	[ ] ___ NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	[ ] ___ NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	[ ] ___ NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	[ ] ___ NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	[X] ___ NI N/A

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	[ ] ___ NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	[X] ___ NI N/A
45. If the SQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b)	273.B	[ ] ___ NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	[X] ___ NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	[X] ___ NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	[ ] ___ NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	[ ] ___ NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	[ ] ___ NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	[ ] ___ NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a)):40 CFR 273.18(g))	273.B	[ ] ___ NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	[ ] ___ NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	[ ] ___ NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	[ ] ___ NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	[ ] ___ NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	[ ] ___ NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	[ ] ___ NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

COMMENTS: